

March 20, 2020

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Via ECF

Hon. Kathleen Tomlinson
United States District Court,
Eastern District of New York
100 Federal Plaza
P.O. Box 9014
Central Islip, New York 11722-9014

Re: Joseph Jackson

-v.-

**Nassau County, et. al
18 CV 3007(JS)(GRB)**

Dear Judge Tomlinson:

As you are aware, our office represents the Defendants, Incorporated Village of Freeport, the Village of Freeport Police Department and individual employees of the Village named as defendants the above subject litigation (the “Village Defendants.”).

Please allow this letter to respectfully request an extension of the Village Defendants’ time to respond to outstanding discovery, which consists of Plaintiff’s demands for interrogatory responses, up to and including May 1, 2020. Due to the current outbreak in COVID-19, the Incorporated Village of Freeport has closed Village Hall and as a result, we have been unable to meet with or obtain information from our clients necessary to respond to the Plaintiff’s demands for interrogatory responses. Additionally, we have had difficulty obtaining information from Defendant Police Officer Melendez in order to prepare responses to the Plaintiff’s demands for responses to interrogatories to Defendant Melendez.

We sincerely apologize for any inconvenience, and please do not hesitate to contact our office to discuss further.

As always, I appreciate the court’s assistance with this matter. If the Court has any questions, please do not hesitate to contact the undersigned.

HARRIS BEACH PLLC
Attorneys for the Village Defendants

s/

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To: All Counsel (Via ECF)